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Attorneys for Mr. Caperon

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE BARRY T. MOSKOWITZ)

UNITED STATES OF AMERICA,	)	Case No.: 07CR3029-BTM
	)	
Plaintiff,	)	Date: July 25, 2008
	)	Time: 1:30 p.m.
v.	)	
	)	<b>NOTICE OF MOTIONS AND MOTIONS TO:</b>
VICTOR LUIS CAPERON,	)	
	)	<b>(1) COMPEL DISCOVERY; AND</b>
Defendant.	)	<b>(2) LEAVE TO FILE FURTHER MOTIONS.</b>
	)	
	)	
	)	

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND  
REBECCA KANTER, ASSISTANT UNITED STATES ATTORNEY:

**PLEASE TAKE NOTICE** that on July 25, 2008, at 1:30 p.m., or as soon thereafter as counsel may be heard, the accused Victor Luis Caperon, by and through his attorneys, Erick L. Guzman and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the motions outlined below.

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**MOTIONS**

Defendant, Mr. Caperon, by and through his attorneys, Erick L. Guzman and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

- (1) Compel Discovery; and
- (2) Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at or before the time of the hearing on these motions.

Respectfully submitted,

Dated: July 18, 2008

/s/ Erick L. Guzman  
**ERICK L. GUZMAN**  
Federal Defenders of San Diego, Inc.  
Attorneys for Mr. Caperon  
erick\_guzman@fd.org